

**REMARKS**

Claims 1-38 are pending. Claims 16 and 17 have been amended to correct typographical errors. In an office action dated November 2, 2004, the Examiner rejected Claims 1-38 as being unpatentable under 35 USC §103. In light of the following remarks, the Applicants respectfully request that the Examiner reconsider and withdraw the rejection.

***Claim Objections:*** The Examiner objected to dependent Claims 16 and 17. Those Claims have been amended to depend from Claim 15 rather than Claim 10.

***Claim Rejections – 35 USC §103:*** The Examiner rejected Claims 1-38 under §103 as being unpatentable over USPN 6,092,078 issued to Adolfsson in view of USPN 6,751,657 issued to Zothner. To establish a prima facie case of obviousness, the Examiner must show some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; that there is a reasonable expectation of success; and that the prior art reference (or references when combined) teach or suggest all the claim limitations. MPEP § 2142.

As is made clear below, The Examiner has not established a prima facie case for obviousness as Adolfsson and Zothner fail to teach one or more elements of each of Claims 1-38.

Adolfsson, as suggested by its title, discloses a method for interfacing a network peripheral with a browser. These network peripherals are referred to as "real word I/O devices" 3102 (Adolfsson, col. 3, lines 28-30) and as "data providing means" 3204-3210 (Adolfsson, col. 5, lines 24-26). Examples of a data providing means provided in Figs. 3 and 4 include temperature sensor 3204, temperature set point 3206, and outdoor camera 3208. For a "data providing means 3102" that is controllable, Adolfsson describes including "control means" in a web page where the "control means can be arranged for adjustment by clicking, dragging or typing control parameter." Adolfsson, col. 3, lines 28-32.

As noted by the Examiner, Zothner discloses a method for associating "business rules with actions in terms of the role of a user in the system." Those actions are defined as the selective provision of notifications to one or more users based on the users' pre-defined role within the system. See, e.g., Zothner, Abstract. Zothner provides the following example:

The NCMS 101 permits notifications to be mapped to the user role 779, such that a user 771 receives only those notifications that are assigned to a particular role. For example, if a user 771 is an engineer, the user 771 can only receive notifications that have been reserved to engineers (e.g., network alarms). The user roles 779 can be altered dynamically; for instance, the engineer's role can be elevated to a manager on a temporary basis. Accordingly, higher level notifications that were previously restricted from the user 771 as an engineer can now be received by the user 771 in the manager role.

Zothner, col. 19, lines 15-24. Notifications are defined as information sent to a recipient. That information pertains to a "business rule trigger." Upon the occurrence of a trigger a corresponding notification is sent to one or more users having a particular role corresponding to the trigger. Zothner, col. 4, lines 42-55. A notification manager 215 is responsible for sending notifications via e-mail, paging, and faxing. Zothner, col. 9, lines 47-48.

Claims 1 and 15: Claim 1 is directed to a method for mediating access to production options and includes the following combination of elements.

1. acquiring a user's access request for a production device; and
2. providing the user with an interface for the production device, the interface having user accessible controls for only those options for which the user has permission to access.

Claim 15 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

As noted above, Adolfsson discloses an interface that includes "control means" for manipulating a control parameter for a "data providing means." The Examiner admits that Adolfsson fails to differentiate between control means that the user has

permission to access and control means that the user does not. In other words, Adolfsson fails to teach the second element listed above.

Instead, the Examiner relies on Zothner, col. 9, line 64 through col. 10, line 8 and col. 19, lines 15-31. The Examiner contends that these sections teach the provision of an interface for a production device, where the interface includes user accessible controls for only those options for which the user has permission to access.

To the contrary, the cited sections of Zothner merely disclose a method for selectively sending notifications to users based on the users' pre-defined roles in a system. The provision of notifications (i.e. information sent via e-mail, pager, or fax) to a user based on that user's pre-defined role is not the same as the provision of a user interface that includes user accessible controls for only those options the user has permission to access. Moreover there is no suggestion or motivation in Adolfsson or in Zothner to modify either to achieve such a result.

Simply stated, the combination of Adolfsson and Zothner fails to teach providing the user with an interface for the production device where the interface has user accessible controls for only those options for which the user has permission to access in the manner required by Claims 1 and 15. Adolfsson focuses on a user interface tailored to the capabilities of a "data providing means" (such as a camera or temperature sensor) and mentions nothing of tailoring a user interface based on the permissions granted to a user. Zothner discloses the selective provision of user notifications based on predefined user roles. Nothing in either reference even suggests tailoring an interface to include particular controls selected based on permissions granted to a user.

For at least these reasons, Claims 1 and 15 are felt to distinguish over Adolfsson and Zothner. Claims 2-12 and Claims 16-26 are also felt to distinguish over the cited references based at least on their dependence from Claims 1 and 15 respectively.

Claims 2 and 16: Claim 2, depends from Claim 1 and recites that the act of acquiring comprises intercepting an access request directed to the production device.

Claim 16 depends from Claim 15 and recites a similar element. Rejecting Claims 2 and 16, the Examiner relies on Adolfsson, col. 3, lines 6-9. That section is reproduced as follows:

The NEIOD 3106 is arranged to provide the node 3104 with a communication module 3108, which is adapted for handling data regarding a specific data providing means 3102.

The Examiner's reliance on this section is confusing. Nothing in this section or elsewhere in Adolfsson even suggests that an access request for a production device be intercepted – that is – that an access request directed to one recipient be received or captured by another recipient. For at least these additional reasons Claims 2 and 16 are felt to distinguish over the cited references.

Claims 3 and 17: Claim 3, depends from Claim 1 and recites that the act of acquiring comprises redirecting the access request. Claim 17 depends from Claim 15 and recites a similar element. Rejecting Claims 3 and 17, the Examiner relies on Adolfsson, col. 2, lines 61-63. That section is reproduced as follows:

All communication between the node 3104 and the data providing means 3102 is performed via a network enabling input output device (NEIOD) 3106.

The Examiner's reliance on this section is confusing as it merely infers that the NEIOD acts as a translator between a node (computer) and a data providing means (camera). Nothing in this section or elsewhere in Adolfsson even suggests that an access request for a production device be redirected – that is – that an access request directed to one recipient be redirected to another recipient. For at least these additional reasons Claims 3 and 17 are felt to distinguish over the cited references.

Claims 4 and 18: Claim 4, depends from Claim 1 and recites that the act of providing comprise:

1. accessing data representing production options to which the user does and/or does not have permission to access;

2. generating an interface according to the accessed data providing user accessible controls for only those options for which the user has permission to access; and
3. presenting the user with the generated interface.

Claim 18 depends from Claim 15 and recites similar elements. Rejecting Claims 4 and 18, the Examiner asserts that Adolfsson, col. 3, lines 28-32 teaches generating an interface in the manner required by the second element above. That section is reproduced as follows:

If a data providing means 3102 presented on the page 3112 is controllable, control means can be presented within the page. The control means can be arranged for adjustment by clicking, dragging or typing control parameters.

The Examiner's reliance on this section is confusing as it neither mentions nor suggests generating an interface according to accessed data and providing user accessible controls for only those options for which the user has permission to access in the manner required by Claims 4 and 18. For at least this additional reason Claims 4 and 18 are felt to distinguish over the over the cited references.

Claims 5, 6, 19, and 20: Claims 5 and 6 and Claims 19 and 20 are felt to distinguish over the cited references based at least on their dependency from Claims 1 and 15 respectively.

Claims 7 and 21: Claim 7, depends from Claim 1 and recites that the act of providing comprise:

1. retrieving an interface for the production device, the interface having user accessible controls for selecting production options for the production device;
2. modifying the interface to allow the user access to the controls for only the production options for which the user has permission to access; and
3. presenting the user with the modified interface.

Claim 21 depends from Claim 15 and recites similar elements. Rejecting Claims 7 and 21, the Examiner asserts that Zothner teaches the second element above.

Specifically, the Examiner relies on Zothner, col. 9, line 64 through col. 10, line 8 and col. 19, lines 15-31.

As discussed above, the cited sections merely disclose the selective provision of notification to users base on pre-defined user roles. Nothing in Zothner even suggests modifying a retrieved interface to allow the user access to the controls for only the production options for which the user has permission to access in the manner required by Claims 7 and 21. Should the Examiner persist, the Applicants ask that the Examiner specifically identify where Zothner discusses modifying a user interface.

Claims 8-12 and 22-26: Claims 8-12 depend at least indirectly from Claim 7 which depends from Claim 1. Claims 22-26 depend at least indirectly from Claim 21 which depends from Claim 15. Claims 8-12 and Claims 22-26 felt to distinguish over the cited references based at least on their dependency from patentable claims.

Claims 13 and 27: Claim 13 is directed to a method for mediating access to production options and includes the following combination of elements

1. acquiring a user' s access request for a production device;
2. accessing a record established for the user, the record containing data representing the production options for the production device to which the user does and/or does not have permission to access;
3. generating a web page for the production device according to the user' s record; and
4. presenting the user with the generated interface.

Claim 27 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

The Examiner asserts that Zothner teaches the second element and that Adolfsson teaches the third element. Specifically, the Examiner relies once again on Zothner, col. 9, line 64 through col. 10, line 8 and Adolfsson, col. 3, lines 25-32. Zothner mentions nothing of accessing a record of the type required by the second

element. Adolfsson mentions nothing of generating a web page according to such a record.

The Examiner's reliance on these sections is mistaken. Should the Examiner persist, the Applicants ask the Examiner specifically identify the portion of Zothner that discloses a record, established for the user, that contains data representing the production options for the production device to which the user does and/or does not have permission to access. The Applicants also ask that the Examiner identify the portion of Adolfsson that discloses generating a web page for a production device according to a user's record.

For at least these reasons Claims 13 and 27 are felt to distinguish over the cited references.

Claims 14 and 28: Claim 14 is directed to a method for mediating access to production options and includes the following combination of elements.

1. acquiring a user's access request for a production device;
2. retrieving a web page for the production device, the web page having user accessible controls for selecting production options;
3. accessing a record established for the user, the record containing data representing the production options for the production device to which the user does and/or does not have permission to access; and
4. altering the web page according to the user's record; and
5. presenting the user with the modified web page.

Claim 28 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

As with Claims 7, 13, 21, and 27 discussed above, neither Adolfsson, nor Zothner discloses accessing a record of the type required by the third element or the altering of a web page in the manner required by the fourth element. For at least these reasons Claims 14 and 28 are felt to distinguish over the cited references.

Claim 29: Claim 29 is directed to a system for performing the method steps of Claim 1. Claim 29 includes the following combination of elements:

1. a production device;
2. a client operable to identify a target document, issue a user' s access request for a selected production device, and select production options;
3. a permission service in electronic communication with the client and the production device, the permission service operable to acquire the access request for the production device and provide the user with an interface for the production device, the interface having user accessible controls for only those options for which the user has permission to access.

The Examiner rejected Claim 29 citing the same sections of Adolfsson and Zothner relied upon for the rejection of Claim 1. for the same reasons Claim 1 is patentable, so is Claim 29. Adolfsson and Zothner, even when combined, fail to disclose or suggest permission service that is operable to provide a user with an interface for a production device where that interface has user accessible controls for only those options for which the user has permission to access.

Claims 30-36: Claims 30-36 are felt to distinguish over the cited references based at least on their dependency from Claims 29.

Claim 33: Claim 33 depends from Claim 31 which depends from Claim 29 and further recites the following elements:

1. a production server operable to serve an interface according to a user' s record, the interface having user accessible controls for selecting production options for the target document;
2. wherein the permission service is operable to retrieve an interface from the production server for a selected production device, modify the interface according to the user' s record, and direct to the client the modified interface.

As with Claims 7, 13, 14, 21, 27, and 28, discussed above, Adolfsson and Zothner, even when combined, fail to disclose a permission service operable to retrieve and then



modify an interface according to a user record in the manner required by the second element. For at least this additional reason Claim 33 is felt to distinguish over the cited references.

Claim 37: Claim 37 is directed to a system for a system for managing electronic document production and includes the following elements.

1. a production device;
2. one or more user records, each user record containing data representing the production options to which the particular user does and/or does not have permission to access;
3. a production server in communication with the production device and operable to generate an interface for that production device according to a user record;
4. a client operable to identify a target document, issue a user' s access request for the production device, and select production options;
5. a permission service operable to access the user' s record, direct the production server to generate an interface for the production device according to the user' s record, and to direct to the client the generated interface;
6. one or more device records, each device record containing data representing the production options offered by the particular production device;
7. a permission engine operable to parse the device records and generate an web page for managing user records;
8. a device locator operable to detect new production devices; and
9. an update service operable to create a device record for each newly detected production device.

As discussed above, Adolfsson and Zothner, even when combined, fail to disclose a record containing data representing the production options to which the particular user does and/or does not have permission to access. The references do not disclose a permission service capable of accessing a user' s record and directing a production server to generate an interface for the production device according to the user' s record.

For at least these reasons, Claim 37 is felt to distinguish over the cited references.

Claim 38 is directed to a system for managing electronic document production and includes the following combination of elements:

1. a production device;
2. one or more user records, each user record containing, for each production device, data representing the production options to which the particular user does and/or does not have permission to access;
3. a production server in communication with the production device and operable to serve an interface for that production device, the interface having user accessible controls for selecting production options for the production device;
4. a client operable to identify a target document, issue a user's access request for the production device, and select production options;
5. a permission service operable to access the user's record, retrieve the interface from the production server, modify the interface according to the user's record, and to direct to the client the modified interface;
6. one or more device records, each device record containing data representing the production options offered by the particular production device;
7. a permission engine operable to parse the device records and generate an web page for managing user records;
8. a device locator operable to detect new production devices; and
9. an update service operable to create a device record for each newly detected production device.

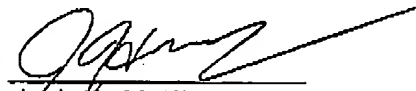
As discussed above, Adolfsson and Zothner, even when combined, fail to disclose a record containing data, for a production device, representing the production options to which the particular user does and/or does not have permission to access. The references do not disclose a permission service capable of accessing a user's record and directing a production server to generate an interface for the production device according to the user's record.

For at least these reasons, Claim 38 is felt to distinguish over the cited references.

**Conclusion:** In view of the foregoing remarks, the Applicant respectfully submits that the pending claims are in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,  
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